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A RORA 3001 DATE RECEIVED B. UNCONTROLLED WASTE SITE CERCLA 103 4) DATE RECEIVED MONTH DAY YEAR D. ONNE ON CHARACTERIZATION OF POTENTIAL HAZARD OI ON SITE INSPECTION BY (Choice of that equity) B. EPA CONTRACTOR C. STATE D. OTHER CONTRACTOR C. STATE C. STATE D. OTHER CONTRACTOR C. STATE C. STATE D. OTHER CONTRACTOR C. STATE C.	A. PRIVATE © 8. FEDERAL:				NICIPAL
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A. EPA B. EPA CONTRACTOR C. STATE D. OTHER CONTRACTOR E. LOCAL HEALTH OFFICIAL F. OTHER: (Breefly)	IV. CHARACTERIZATION OF POTENTIAL HAZARD				
A. ACTIVE B BNACTIVE C. UNKNOWN BEGINNING THAT CUNKNOWN O4 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT. KNOWN, OR ALLEGED O//y Waste (Toxic) Heavy Metals (Soluble/Toxic/Persistant) O5 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Ground Water (Population / Environment of the property of the p	O VES DATE MONTH DAY YEAR DE.	EPA 🔲 B. EPA LOCAL HEALTH OFFIC			CONTRACTOR
O'/y Waste (Toxic) Heavy Metals (Soluble/Toxic/Persistant) OS DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Ground Water (Population / Environ ment) V. PRIORITY ASSESSMENT OT PRIORITY FOR INSPECTION (Check one # Ingn or medium a checked, complete Pert 2: Waste information and Pert 3: Description of Mazareous Conditions and incidental) A High B. MEDHUM (Inspection information) VI. INFORMATION AVAILABLE FROM OT CONTACT OT OF (Agency: Organization) OT TELEPHONE NUMBER	☐ A. ACTIVE ☐ B INACTIVE ★C. UNKNOWN		Unk	UNKNOW	N
V. PRIORITY ASSESSMENT OI PRIORITY FOR INSPECTION (Check one # Ings or medium a checked. complete Part 2: Water information and Part 3: Description of Mazerbous Conditions and incidents) A. HIGH (Inspection required promptly) VI. INFORMATION AVAILABLE FROM OI CONTACT O2 OF (Agency/Organization) O3 TELEPHONE NUMBER ()	Oily Waste (Toxic)				
O1 PRIORITY FOR INSPECTION (Check one if high or medium a checked, complete Part 2: Waste information and Part 3: Description of Mexamples Conditions and Incidents) A. HIGH (Inspection required promptly) B. MEDIUM (Inspection required promptly) (Inspection required promptly) VI. INFORMATION AVAILABLE FROM O1 CONTACT O2 OF (Agency/Organization) O3 TELEPHONE NUMBER (1)					
A. HIGH X B. MEDIUM C. LOW D. NONE (Inspection required promptly) X B. MEDIUM C. LOW Inspection required promptly) X B. MEDIUM Inspection required D. NONE (Ne Author action needed, complete current disposition forms)	V. PRIORITY ASSESSMENT				
01 CONTACT 02 OF (Agency/Organization) 03 TELEPHONE NUMBER	□ A. HIGH X B. MEDIUM □ C. LOW □ D, NONE				
()	VI. INFORMATION AVAILABLE FROM			····	
04 PERSON RESPONSIBLE FOR ASSESSMENT TO A COCANITATION TO THE PROPERTY TO THE	01 CONTACT	02 OF (Agency/Organizat	ton)		03 TELEPHONE NUMBER
Rich Lange IEPA HSCS (217)782-6760 09 106,85	04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY IEPA	08 ORGANIZATION HSCS	07 TELEPHONE NUMBER (217) 782-6760	08 DATE 06,85 MONTH DAY YEAR

SEPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

- 1	I. IDENT			
	OI STATE	02 SITE N	X98	803

II. WASTE ST	TATES, QUANTITIES, AN	ID CHARACTER	ISTICS				
O1 PHYSICAL ST	TATES Check at that apply:	02 WASTE QUANT		03 WASTE CHARACTE	ERISTICS Checkening	2 CC/V	
SOLIO B POWDER C SLUDGE	G GAS	TONS CUBIC YARDS	or easte quantities Crepanten	A TOXIC SOLUBLE I HIGHLY VOLATILE B CORROSIVE F INFECTIOUS J EXPLOSIVE C RADIOACTIVE G FLAMMABLE K REACTIVE D PERSISTENT H IGNITABLE L INCOMPATIBLE		SIVE IVE PATIBLE	
D OTHER	(Specity)	NO OF DRUMS				M NOT A	PPLICABLE
III. WASTE TY	YPE						
CATEGORY	SUBSTANCE N	AME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS		
SLU	SLUDGE				_		
OLW	OILY WASTE		Unk	Unk	Grude	0:1	
SOL	SOLVENTS						
PSD	PESTICIDES						
occ	OTHER ORGANIC CH	1EMICALS	Unk	Unk	Brine	Waste	
,OC	INORGANIC CHEMIC	ALS					
ACD	ACIDS						
BAS	BASES						
MES	HEAVY METALS		Llak	Unk	Brine	Waste	
IV. HAZARDO	DUS SUBSTANCES SON AS	gpendis for most frequent	rry c-red CAS Numbers)	,			2.2-22
OI CATEGORY	02 SUBSTANCE N	AME	03 CAS NUMBER	04 STORAGE DISF	POSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
			 	 			-
			<u> </u>	 		1	
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V. FEEDSTO	CKS See Appendix for CAS Numbe	0131					
CATEGORY	01 FEEDSTOC	K NAME	02 CAS NUMBER	CATEGORY	01 FEEDST	TOCK NAME	02 CAS NUMBER
FDS				FOS			
FDS				FDS			
FDS				FDS			
FCS				FDS			
VI. SOURCES	OF INFORMATION (Cite	specific references is g	state ries sample analysis	reports)			
	Feder	al 5.I.	A. #C	1183			

SEPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

1. IDENTIFICATION

01 STATE 02 SITE MARKET

ILD 980 898 803

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

II. HAZARDOUS CONDITIONS AND INCIDENTS		
01 X A GROUNDWATER CONTAMINATION 400	02 _ OBSERVED (DATE 04 NARRATIVE DESCRIPTION	X POTENTIAL ALLEGED
Highly soluble brine , lagoon. This practice has i		posal in unlined
lagoon. This practice has i	impacted private wells	at similar facilitie
9	•	
01 B SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED	02 TOBSERVED IDATE 104 NARRATIVE DESCRIPTION	_ POTENTIAL ALLEGED
01 T C CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED	02 _ OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL : ALLEGED
01 D FIRE EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	C POTENTIAL C ALLEGED
01 TE DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	T POTENTIAL ALLEGED
01 XF CONTAMINATION OF SOIL UNK	02 G OBSERVED (DATE	X POTENTIAL ALLEGED
Loss of production (Ag been noted at similar 3	04 NARRATIVE DESCRIPTION (land) + damage to s (ites.	soil structure has
	(See J following)	See 05 Other following
01 XG DRINKING WATER CONTAMINATION 400	02 EI OBSERVED (DATE 04 NARRATIVE DESCRIPTION	POTENTIAL ALLEGED
See A above		
01 H WORKER EXPOSURE INJURY 03 WORKERS POTENTIALLY AFFECTED	02 C OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	U POTENTIAL ALLEGED
01 1 POPULATION EXPOSURE/MUURY 03 POPULATION POTENTIALLY AFFECTED	02 COBSERVED (DATE) 04 NARRATIVE DESCRIPTION	C) POTENTIAL C ALLEGED

&EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

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I. IDENTIFICATION
01 STATE 02 SITE NUMBER

PART 3 - DESCRIPTION	ON OF HAZARDOUS CONDITIONS AND INCIDENTS
E HAZARDOUS CONDITIONS AND INCIDENTS	
01 M.J. DAMAGE TO FLORA OF NARRATIVE DESCRIPTION	ozciosserved (date) Apotential calleged sterilization of soils (>5 acres), Attributed to has been noted at other similar sites.
increased soil salinity	has been noted at other similar sites.
	F Above) (See 05 other following)
01 K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (INclude name(s) of species)	02 OBSERVED (DATE) POTENTIAL ALLEGED
01 (3 L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 - OBSERVED (DATE) - POTENTIAL - ALLEGED
01 (; M. UNSTABLE CONTAINMENT OF WASTES (Selfs rooff sering found technic driving) 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) POTENTIAL ALLEGED O4 NARRATIVE DESCRIPTION
01 (N DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 (. OBSERVED (DATE) POTENTIAL ALLEGED
01 € O CONTAMINATION OF SEWERS, STORM DRAI 04 NARRATIVE DESCRIPTION	NS. WWTPs 02 - OBSERVED (DATE) - POTENTIAL - ALLEGED
01 MP ILLEGAL/UNAUTHORIZED DUMPING 04 MARATIVE DESCRIPTION 5:te was infrequently has now been backfille	ozobservedidate potential calleged inspected by regulatory agencies, Facility d making illegal dumping hard to detect.
Mos description of any other known potential and ing of soils by crosion in soveral IL	L OR ALLEGED HAZARDS Drines is deemed leading cause of soil . Counties.
M. TOTAL POPULATION POTENTIALLY AFFECTS	50: <u>400</u>
IV. COMMENTS	
EBO Oil Co. Address Unrepor Centralia IL 65)50 ₁
V. SOURCES OF INFORMATION (City specific references	e g state files sample analysis, reports)
S.I.A. study	

EXECUTIVE SUMMARY

This site has been placed in the ERRIS data base as a result of its selection for Phase II evaluation during the federally funded Surface Impoundment Assessment (SIA) study of 1980. During ERRIS placement the operator name and business address were utilized from the SIA which results in deviations from ERRIS for actual site location, Part I section II items 02 through 08 of form 2070-12. This use of operator name and address has also led to one (1) ERRIS listing representing, in actuality, from one (1) to one hundred eight (108) actual brine pits at an equal number of separate locations.

Some considerable effort has been expended to select the site with highest, Phase II SIA, pollution potential where multiple sites are represented by a single ERRIS listing. One must keep in mind that the Phase II SIA represents no more than 7 percent of the brine pits identified in Illinois. Phase I identified more than 3200 pits where Phase II evaluated a random selection of less than 220. One must also maintain a realization that phase II pollution potential was determined by bench top study with little or no actual site visitation or monitoring.

Minimal to no file information exists on this site beyond that contained in Phases I and II of the SIA. There is no direct evidence of hazardous waste disposal at this site beyond the potentially hazardous constituents of Illinois Basin brines, but with only annual inspections by Illinois Mines and Minerals staff relevent to oil production practices and recent backfilling of most brine pits in Illinois, disposal of off site material of unknown nature is possible. A literature review and laboratory analysis of samples from two other sites indicate concern for contamination of groundwater/surface water by Sodium, Sulfate, Chloride etc. (Non-Hazardous Constituents), concern for heavy metals (i.e., Chrome, Vanadium, Barium) and long chain hydrocarbons.

A question arises as to the addressability of the heavy meatals by CERCLA when one considers 40 CFR section 300.6 "Definitions - Federally Permitted Release (i)" and Section 101(10) of CERCLA. The statement "and which are reinjected" seems to allow CERCLA action, but interpretation and clarification by <u>USEPA legal staff seems required</u>. The long chain hydrocarbons would appear to be included in the exclusion given to crude oil and fractions thereof under 40 CFR section 300.6 "Definitions-Hazardous Substance" and 101(14) of CERCLA.

A medium priority has been assigned due to the potential impact of this site on groundwater in a rural area where private wells are generally the sole source for potable water. Similar sites have impacted private wells to a point requiring users to seek alternative sources for drinking water. A site inspection should be scheduled to verify/update owner-operator information and gain more thorough site specific information.

RML:bf/22

